JUN 18 1992

CERTIFIED MAIL
Return Receipt Requested
Article Number: P 679 713 758

Mr. Melvin Cunningham
Big Woods Auto
P. O. Box 981
Cedar Falls, IA 50613

Re: Big Woods Auto
Cedar Falls, Iowa
EPA ID No. IAD981711948
Docket No. VII-88-H-0013

Dear Mr. Cunningham:

The U. S. Environmental Protection Agency (EPA) has completed its review of the February 1989 closure plan for the facility referenced above. The closure plan was submitted as required by paragraph 24.a of the December 1988 Consent Agreement and Consent Order, Docket No. VII-88-H-0013. The tentative decision has been made to approve with modifications the closure plan for the hazardous waste management unit (one container storage unit). The EPA herein modifies the closure plan with the inclusion of the modifications listed in the addendum titled "Closure Plan Modifications For the Big Woods Auto Facility, June 1992". The modifications are necessary in order that the closure plan complies fully with the requirements specified in Title 40 Code of Federal Regulations (CFR) Part 264.

The modifications made are summarized below. The reason for each change is also stated.

1. We deleted Section II, which is titled "Closure Plan" and pertains to action levels, since the information contained in this section is not accurate. We replaced this section with the closure plan objectives. This modification is identified as modification number 1.

2. We modified Section II which is titled "Performance Standard" to specify the closure performance standards for each hazardous constituent which may be present at the site against which success of the clean closure effort can be measured. The clean-up target levels of xylene and toluene are within the range of acceptability for Resource Conservation and Recovery Act (RCRA) clean closures. This modification is identified as modification number 2.

RCRA:IOWA:FREY:tb x7127:06-16-92 b:1\WP\103A\RESPONSE: NO

IOWA	IOWA	IOWA	RCRA	IOWA
FREY	JONES	CALLIER	SANDERSON	DOLINGER
6/16/92	6/17/92	6/17/92	6/17/92	

3. We modified Section IV which is titled "Sites" to further clarify the boundary of the hazardous waste storage unit at the Big Woods Auto facility. This modification is identified as modification number 3.

4. We deleted all references and information made to the Coffman Auto Body site in the section titled "Soil Sampling Plan." Modification number 4 is necessary because this plan must only pertain to the Big Woods Auto site.

5. We deleted the section titled "Sampling Methodology - Sample Size" and replaced it with the section titled "Soil Sampling Procedures". The basis for modification number 5 is to require that soil samples be collected and analyzed for the constituents of concern from the 12 to 18 inch interval instead of the 0 to 6 inch interval. Soil samples which will be analyzed for volatile organic compounds should be collected from undisturbed soil intervals. In addition, EPA will be collecting split (or duplicate) soil samples in order to determine if additional closure activities are necessary.

6. We deleted the information in the section titled "Sampling Methodology - Sampling Tools, Usage and Decontamination" and replaced it with information specifying the proper sampling techniques which are in accordance with 40 CFR § 264.112(b)(4) and the most recent edition of EPA publication SW-846, "Test Methods for Evaluating Solid Waste, Physical/Chemical Methods." In addition, we specified which laboratory sampling analysis methods from the EPA publication SW-846 are to be followed and the procedures to follow for the decontamination of sampling equipment. This modification is identified as modification number 6.

7. We deleted the section titled "Sampling Methodology - Soil Sample Testing and Report Schedule". The basis for modification number 7 is that the reporting schedule provided was not sufficient to ensure that EPA would receive the thirty (30) days advance notice of a sampling event.

8. We added a section to the closure plan titled "Closure Schedule" which includes a closure schedule and specifies that the facility will notify the EPA, in writing, no less than 30 days prior to the date(s) on which the sampling activity is to occur. In addition, the approved closure plan must be completed within 180 day as required by 40 CFR § 264.113(b). This modification is identified as modification number 8.

9. We added a paragraph to the section titled "Closure Schedule" which requires Big Woods Auto to notify EPA Region VII, in writing, of the discovery of unexpected events which may necessitate a change to the closure plan or of any deviation from

the closure plan schedule due to unforeseen events. This modification is identified as modification number 9.

10. We added a section to the closure plan titled "Disposal of Generated Waste and Contaminated Soil" to specify the procedures for handling contaminated soils and hazardous waste generated during closure. This modification is identified as modification number 10.

11. We added the section titled "Closure Certification" to specify that within sixty (60) days of completing the approved closure plan, the owner/operator and an independent, registered professional engineer will provide the required certification and background documentation. This modification is identified as modification number 11.

The 30 day public notice regarding EPA's tentative decision to approve the closure plan is scheduled to begin on June 30, 1992, and end on July 30, 1992. An announcement of the public notice will appear in the local newspaper, the Waterloo Courier, on the first day of the public notice period. A copy of the information being made available for public review is enclosed. You are invited to submit written comments and/or request a public hearing at any time prior to the expiration of the public comment period. All comments submitted during the comment period will be addressed prior to the approval of the plan.

Any questions concerning this letter may be directed to Ms. Patricia Frey, of my staff, at (913) 551-7058.

Sincerely,

Michael J. Sanderson
Chief, RCRA Branch
Waste Management Division

Enclosures

cc: Ron Coffman, Coffman Auto Body
Pete Hamlin, IDNR

bcc: E. Jane Kloeckner, CNSL

JUN 18 1992

CLOSURE PLAN MODIFICATIONS FOR
THE BIG WOODS AUTO FACILITY

June 1992

Facility: Big Woods Auto Facility
Location: Cedar Falls, Iowa
EPA ID No.: IAD981711948

The following modifications amend the Big Woods Auto Facility closure plan, which is dated February 1988.

1. The information in Section II, which is titled "Closure Plan," (beginning with "Closure activities consist of implementation..." and ending with "achieving the closure plan performance standard.") is deleted. This information is replaced with the following:

"II. CLOSURE PLAN

Big Woods Auto intends to close the hazardous waste container storage unit following the U. S. Environmental Protection Agency's (EPA's) approval of this closure plan. Closure activities include the collection and analysis of soil samples. The planned activities are intended to meet the requirements of Title 40 Code of Federal Regulations (CFR) § 264.111, which is the following:

> The owner of operator must close the facility in a manner that:
>
> (a) Minimizes the need for further maintenance; and
>
> (b) Controls, minimizes or eliminates, to the extent necessary to protect human health and the environment, post-closure escape of hazardous waste, hazardous constituents, leachate, contaminated run-off, or hazardous waste decomposition products to the ground or surface waters or to the atmosphere; and

RCRA:IOWA:FREY:tb x7127:06-16-92 b:1/WP 103AA/RESPONSE:NO

IOWA	IOWA	IOWA	IOWA
FREY	JONES	CALLIER	DOLINGER
pas 6/16/92			

(c) Complies with the closure requirements of this subpart, including, but not limited to, the requirements of §§ 264.178, 264.197, 264.228, 264.258, 264.280, 264.310, 264.351, and 264.601 through 264.603."

2. The section titled "Performance Standard" on page 3 of the closure plan is modified to include the following information:

"Clean-up Target Levels. In accordance with 40 CFR § 264.111, this closure plan is designed to insure that the facility will not require further maintenance and control subsequent to the completion of closure activities. This closure plan specifies a "clean closure" (i.e. closure leaving no wastes or waste residues in place).

The hazardous constituents which the clean-up target levels must address, include, but are not limited to, the following constituents: xylene and toluene. The clean-up target levels for these constituents will be as follows:

Hazardous Constituents	Soil, (mg/kg)
Xylene	1000.0
Toluene	100.0

Successful closure of the container storage unit will be achieved when the soil no longer contains hazardous constituents of concern in excess of the clean-up target levels. If concentrations of the hazardous constituents of concern are detected in any of the soil samples in excess of the clean-up target levels, the facility shall proceed to determine the vertical and horizontal extent of soil contamination. Additional sampling will be proposed in a closure plan amendment to EPA within thirty (30) days of receipt of the analytical results in accordance with 40 CFR § 264.112(c). The closure plan amendment requires EPA approval."

3. The following sentence is added to Section IV which is titled, "SITES" and on page 4 of the closure plan:

"The boundaries of the hazardous waste container storage unit at Big Woods Auto consist of the 35 foot by 38 foot storage area and is 0 to 18 inches below the soil's surface. The storage unit is depicted in Exhibit B of the closure plan."

4. The section titled "Soil Sampling Plan" on page 4 of the closure plan has been modified by deleting all references to the Coffman Auto Body site.

5. The complete paragraph of the Section titled "Sampling Methodology - Sample Size" on page 5 (beginning with "Each sample shall consist..." and ending with " ground surface to a depth of six inches.") has been deleted and replaced with the following:

"Soil samples will be collected using an hand auger and split-spoon sampler, or other appropriate boring and sampling devices. Disposal latex gloves will be worn during sampling and will be changed between the collection of each sample. The facility will collect soil samples at the 0 to 6, 6 to 12, and 12 to 18 inch interval below the ground surface at the sampling locations depicted in Exhibit B of the closure plan. A discrete soil sample must be collected from each soil interval. Mixing of a soil interval before collecting a sample is prohibited. Only the discrete soil samples collected from the 12 to 18 inch intervals need to be placed in four-ounce glass containers with Teflon-lined closures supplied by the laboratory. An EPA employee, or authorized representative, may collect and have analyzed the split (or duplicate) soil samples collected from each interval at each boring. All analytical results (facility's and EPA's) will be utilized in determining if additional closure activities, such as soil sampling or excavating contaminated soil, is required."

6. The section titled "Sampling Methodology - Sampling Tools, Usage and Decontamination" on page 5 (beginning with "Each soil sample shall be extracted ..." and ending with "regular licensed EPA hazardous waste hauler.") has been deleted and replaced with the following:

"Sample Handling. Soil sample containers will be labeled with facility name, boring and interval identification, date, time of collection, and initials of sampling personnel. The soil samples must then be placed in coolers and preserved to 4°C with cold packs in such a manner as to prevent breakage. Chain of custody forms and appropriate sample request forms will be completed and accompany all samples during shipment to the lab. A sample chain of custody form is presented in Appendix G.

Analytical Methods. All soil samples will be analyzed using EPA-approved methods as outlined in EPA Manual SW-846. Analytical parameters for soil samples were determined based on hazardous waste stored at the container storage unit or suspected constituents present within a waste. The following table presents a summary of the parameters and analytical methods to be followed:

Parameter	Container	Preservation	Analytical Methods[a]	Maximum Holding Times
Xylene	4 oz. glass jar with Teflon-lined lid	Cool to 4°C	8240	14 days
Toluene	4 oz. glass jar with Teflon-lined lid	Cool to 4°C	8240	14 days

[a] "Test Methods for Evaluating Solid Waste Physical/Chemical Methods", SW-846

from pw 6/14/92

Auger Cuttings. The auger cuttings ~~form~~ the soil sampling activities will be collected, placed in containers and transferred to the temporary storage area identified by the facility. The auger cuttings will be managed in accordance with the criteria presented in the section titled "Disposal of Generated Waste and Contaminated Soil" in the closure plan.

Decontamination of Equipment. Equipment used in soil sample collection will be steamed cleaned or hand washed with water and a nonfoaming detergent and rinsed with distilled water prior to use and between the collection of each sample. The water generated from decontamination activities will be collected and containerized. The containerized decontamination water will be transferred to the hazardous waste storage unit identified by the facility and handled in accordance with the criteria presented in the section titled "Disposal of Generated Waste and Contaminated Soil" in the closure plan.

7. The complete paragraph of the section titled "Sampling Methodology - Soil Sample Testing and Report Schedule" on page 6 (beginning with "Soil sampling must be accomplished..." and ending with "...the soil sample locations are not frozen.") has been deleted.

8. The following section titled "Closure Schedule" is added to the closure plan:

CLOSURE SCHEDULE

Days Following EPA's Approval of Closure Plan	Closure Activity
Day 0	EPA grants final closure plan approval.
By Day 10	Implementation of the approved closure plan begins.
30 days prior to sampling	Notify EPA Region VII of proposed soil sampling dates.
By Day 90	Collect samples of soil and submit to laboratory for analysis.
By Day 120	Obtain sample analytical results from laboratory.
By Day 180	Complete approved closure plan activities.

NOTE: No less than thirty (30) days prior to the date(s) on which the sampling is done to verify clean closure, the owner/operator and/or certifying engineer will notify the EPA in writing of the date(s) on which the sampling activity is to occur in order that the Agency may, if necessary, arrange for an EPA employee or representative to be on-site to observe the sampling to verify clean closure, and obtain split or duplicate samples.

9. The following paragraph has been added to the section titled "Closure Schedule":

"Any deviations from the closure plan schedule due to uncontrollable or unforeseen events, delays due to inclement weather, or the discovery of unexpected events occur which necessitates a change to the closure plan, the owner/operator will notify the EPA, in writing, of the reason for the delay, provide a revised schedule, amend the closure plan as necessary and if applicable request an extension within thirty days of the occurrence of the unexpected event. Extensions to the closure plan period may only be granted by the EPA in accordance with 40 CFR § 264.113."

10. The following section titled "Disposal of Generated Waste and Contaminated Soil" is added to the closure plan:

"All solid waste streams generated during closure, such as equipment decontamination waste and collected rinsewater, are subject to the hazardous waste determination requirement

specified at 40 CFR § 262.11. The waste generated during the closure process will be placed in 55-gallon drums and managed as a hazardous waste until the results of the analysis show them to be otherwise. In accordance with 40 CFR § 261.3, if the waste exhibits one, or more, of the hazardous characteristics specified in 40 CFR § 261 Subpart C, or is a mixture of a listed hazardous waste and a solid waste, then the waste meets the definition of a hazardous waste and must be managed inn accordance with all applicable hazardous waste regulations. Hazardous waste will be managed at facilities approved to managed hazardous waste.

Upon excavation, soil which potentially contains hazardous constituents must be placed in containers or tanks and managed as hazardous waste in accordance with 40 CFR § 262.34 until the results of the analysis show them to be otherwise. If the contaminated soil contains listed hazardous waste above the Agency-approved health-based levels, or if the contaminated soil exhibits one, or more, of the hazardous characteristics specified in 40 CFR 261 Subpart C, then the contaminated soil must be managed in accordance with all applicable hazardous waste regulations. Hazardous waste will be managed at facilities approved to managed hazardous waste.

During implementation of the closure plan, hazardous wastes shall not be accumulated in the container storage area undergoing closure. Hazardous wastes accumulated from the date of EPA's approval of the closure plan until the Agency's acceptance of the closure certification required by 40 CFR § 264.115, shall be accumulated in alternate location(s) selected by the facility, and in accordance with the regulations specified in 40 CFR § 262.34."

11. The following section titled "Closure Certification" is added to the closure plan:

"Within sixty (60) days of completion of the approved closure plan, the owner/operator and an independent, registered professional engineer will provide to EPA, by registered mail, the required certification that all closure activities have been performed in accordance with the approved closure plan. Documentation furnished with the certification statements must include, but not be limited to, photographs of closure activities with closure observation narrative, chain-of-custody forms, laboratory reports, analytical data with the results summarized, a comparison of the closure performance standards to the sample analysis results, and manifest forms."

JUN 18 1992

CLOSURE SUMMARY

Facility Name: Big Woods Auto

Facility Address: 3305 Big Woods Road
Cedar Falls, Iowa 50613

EPA ID Number: IAD981711948

Facility Point of Contact: Mr. Melvin Cunningham
(319) 987 2638

Unit(s) Undergoing Closure: Hazardous Waste Container Storage Unit

Wastes Managed in Unit(s): F003, F005

Hazardous Constituents of Concern: Xylene, Tolyene

Closure Activities: Collection and analysis of soil samples

Clean-up Objectives:

HAZARDOUS CONSTITUENT	SOIL, mg/kg	RINSEWATER, mg/l	GROUNDWATER, mg/l
Xylene	1000	NA	NA
Toluene	100	NA	NA

06/92
PAF

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VII
726 MINNESOTA AVENUE
KANSAS CITY, KANSAS 66101

JUN 18 1992

CERTIFIED MAIL
Return Receipt Requested
Article Number: P 679 713 758

Mr. Melvin Cunningham
Big Woods Auto
P. O. Box 981
Cedar Falls, IA 50613

Re: Big Woods Auto
Cedar Falls, Iowa
EPA ID No. IAD981711948
Docket No. VII-88-H-0013

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The modifications made are summarized below. The reason for each change is also stated.

1. We deleted Section II, which is titled "Closure Plan" and pertains to action levels, since the information contained in this section is not accurate. We replaced this section with the closure plan objectives. This modification is identified as modification number 1.

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Sincerely,

James V. Callier

for Michael J. Sanderson
Chief, RCRA Branch
Waste Management Division

Enclosures

cc: Ron Coffman, Coffman Auto Body
Pete Hamlin, IDNR

JUN 1 8 1992

CLOSURE PLAN MODIFICATIONS FOR THE BIG WOODS AUTO FACILITY

June 1992

Facility: Big Woods Auto Facility
Location: Cedar Falls, Iowa
EPA ID No.: IAD981711948

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(c) Complies with the closure requirements of this subpart, including, but not limited to, the requirements of §§ 264.178, 264.197, 264.228, 264.258, 264.280, 264.310, 264.351, and 264.601 through 264.603."

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[a] "Test Methods for Evaluating Solid Waste Physical/Chemical Methods", SW-846

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specified at 40 CFR § 262.11. The waste generated during the closure process will be placed in 55-gallon drums and managed as a hazardous waste until the results of the analysis show them to be otherwise. In accordance with 40 CFR § 261.3, if the waste exhibits one, or more, of the hazardous characteristics specified in 40 CFR § 261 Subpart C, or is a mixture of a listed hazardous waste and a solid waste, then the waste meets the definition of a hazardous waste and must be managed inn accordance with all applicable hazardous waste regulations. Hazardous waste will be managed at facilities approved to managed hazardous waste.

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JUN 18 1992

CLOSURE SUMMARY

Facility Name: Big Woods Auto

Facility Address: 3305 Big Woods Road
Cedar Falls, Iowa 50613

EPA ID Number: IAD981711948

Facility Point of Contact: Mr. Melvin Cunningham
(319) 987 2638

Unit(s) Undergoing Closure: Hazardous Waste Container Storage Unit

Wastes Managed in Unit(s): F003, F005

Hazardous Constituents of Concern: Xylene, Tolyene

Closure Activities: Collection and analysis of soil samples

Clean-up Objectives:

HAZARDOUS CONSTITUENT	SOIL, mg/kg	RINSEWATER, mg/l	GROUNDWATER, mg/l
Xylene	1000	NA	NA
Toluene	100	NA	NA